

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

FILED

(Will notice)

2011 OCT 12 P 3:00

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

JANE DOE
c/o Jenner & Block LLP
1099 New York Avenue, NW
Suite 900
Washington, DC 20001

Plaintiff,

Case No.

1211 CV 1105

v.

LINDA HOWARD
RUSSELL HOWARD

[REDACTED] *
Arlington, VA 22204

Defendants.

MOTION TO COMMENCE AND PROCEED USING A PSEUDONYM

Plaintiff, through undersigned counsel, hereby requests leave to commence and proceed with this action anonymously. Plaintiff's identity is known to the Defendants and is disclosed to the Court through an affidavit attached as Exhibit A, filed under permanent seal. This motion is supported by the following Memorandum of Points and Authorities, the affidavit, and the Complaint. Wherefore, Plaintiff respectfully requests that this Court:

1. Allow Plaintiff to file all court papers under the fictitious name, "Jane Doe."
2. Allow Plaintiff to redact all court papers to conceal personal identifying information of the Plaintiff.
3. Order that the parties, their counsel, and any expert witnesses who may be consulted or designated by the parties be required to maintain the confidentiality of Plaintiff's identity

*Mrs. Doe redacts the home address of Defendants pursuant to the Court's Guide to the amendments to Local Civil Rule 7 Concerning Personal Identifiers.

and to not disclose Jane Doe's true name to non-parties.

4. Exclude the public from all court proceedings in which Plaintiff makes a personal appearance.
5. Grant any other relief that this Court deems necessary and just.

Respectfully submitted,

Dated: 10/12/11

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* Admission *pro hac vice* pending in this jurisdiction.